Brent O. Hatch (5715) HATCH, JAMES & DODGE 10 West Broadway, Suite 400 Salt Lake City, Utah 84101 Telephone: (801) 363-6363 Facsimile: (801) 363-6666

Stephen N. Zack (admitted pro hac vice)
Mark J. Heise (admitted pro hac vice)

David K. Markarian (admitted pro hac vice) BOIES, SCHILLER & FLEXNER LLP

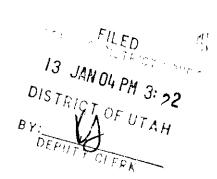
Bank of America Tower, Ste. 2800

100 Southeast Second Street

Miami, Florida 33131

Telephone: (305) 539-8400 Facsimile: (305) 539-1307

Attorneys for Plaintiff



IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF UTAH, CENTRAL DIVISION

THE SCO GROUP,) PLAINTIFF SCO'S NOTICE OF COMPLIANCE WITH
Plaintiff,	COURT ORDER OF DECEMBER 12, 2003
v.)) Case No. 2:03CV0294DAK
INTERNATIONAL BUSINESS MACHINES CORPORATION,) Hon. Dale A. Kimball
Defendant.) Magistrate Judge Brooke Wells

Plaintiff/Counterclaim Defendant SCO hereby files its Notice of Compliance with this Court's Order entered on December 12, 2003, and states:

- 1. SCO has responded fully and in detail to Interrogatories 1-9, 12 and 13 of IBM's First Set of Interrogatories. (See SCO's Supplemental Response to Defendant's First and Second Set of Interrogatories dated January 12, 2004) (hereinafter "Supplemental Responses."). These Supplemental Responses, which exceed 60 pages, fully respond to the interrogatories based on the information in SCO's possession. Upon receiving complete discovery from IBM, including all versions of AIX and Dynix/ptx, there undoubtedly will be further evidence of IBM's contractual breaches and other violations of law, as detailed in the attached Declaration of Ryan Tibbits. Accordingly, SCO reserves the right to further supplement or amend its answers as discovery or further investigation may reveal.
- 2. SCO also has produced all non-privileged responsive documents requested by IBM. The only exception to such production is the files of certain officers and directors for whom SCO could not obtain the requested materials during the holidays with sufficient time to review the documents. The efforts to obtain these files and their expected production date are set forth in the attached Declaration of Ryan Tibbitts.

Respectfully submitted,

DATED this 12th day of January, 2004.

HATCH, JAMES & DODGE, P.C. Brent O. Hatch Mark F. James BOIES, SCHILLER & FLEXNER LLP Bank of America Tower, Suite 2800 100 Southeast Second Street Miami, Florida 33131 (305) 539-8400 (305) 539-1307 Facsimile Stephen N. Zack Mark J. Heise David K. Markarian (admitted pro hac vice)

Course! for Plaintiff/Courserclaim defendant

(admitted pro hac vice)

CERTIFICATE OF SERVICE

Plaintiff, The SCO Group, hereby certifies that a true and correct copy of Plaintiff's Notice of Service of Discovery was served on Defendant International Business Machines Corporation on this Andrew day of January, 2004, by Federal Express mail to:

Evan R. Chesler, Esq. Cravath, Swaine & Moore LLP Worldwide Plaza 825 Eighth Avenue New York, NY 10019

Alan L. Sullivan, Esq. Snell & Wilmer L.L.P. 15 West South Temple, Ste. 1200 Gateway Tower West Salt Lake City, Utah 84101-1004

and by mail to:

Donald J. Rosenberg, Esq. 1133 Westchester Avenue White Plains, New York 10604 BOIES, SCHILLER & FLEXNER LLP Bank of America Tower, Suite 2800 100 Southeast Second Street Miami, Florida 33131 (305) 539-8400 (305) 539-1307 Facsimile

By:

Mark J. Heise (admitted pro hac vice)